

Defendants respectfully request a brief, two-day extension of time to the previously agreed-to November 3, 2021 deadline for filing their reply brief. Good cause supports this motion. Additional urgent matters that have arisen in Defense counsel's cases, after the parties submitted their Joint Proposed Scheduling Order, will impede Defendants' ability to prepare a reply brief by that date. Accordingly, Defendants seek additional two days, or until November 5, 2021, to submit a reply brief in support of their Motion to Dismiss. Plaintiff does not oppose this request.

DATE: October 29, 2021

Respectfully submitted,

JOSEPH C. MURPHY, JR.
Acting United States Attorney

s/ Audrey M. Calkins

Audrey M. Calkins (TN BPR # 030093)
Audrey.calkins@usdoj.gov
167 N. Main Street, Suite 800
Memphis, TN 38103
901-544-4231
Fax: 901-544-4230

BRIAN M. BOYNTON
Acting Assistant Attorney General

LESLEY FARBY
Assistant Branch Director
Civil Division, Federal Programs Branch

/s/ Kyla M. Snow

EMILY SUE NEWTON (VA Bar No. 80745)
Senior Trial Counsel
KYLA M. SNOW (Ohio Bar No. 96662)
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, D.C. 20005
Tel: (202) 514-3259 / Fax: (202) 616-8460
Kyla.snow@usdoj.gov

Counsel for Defendants